

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CARL GOODLOE,

Plaintiff,

-against-

NOTICE OF MOTION

12 CV 3018 (AMD) (VMS)

THE CITY OF NEW YORK, JOHN DOE
UNDERCOVER POLICE OFFICER #2570,
DETECTIVE COOK, DETECTIVE DAUGE,
SARGEANT RAMIREZ, POLICE OFFICER
FRANK CHIODI, AND JOHN DOE POLICE
OFFICERS 1-5 of the NEW YORK CITY POLICE
DEPARTMENT,

Defendants.

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PLEASE TAKE NOTICE that upon the Declaration of Erica M. Haber, dated July 15, 2016, and the exhibits annexed thereto, Defendants' Statement of Undisputed Material Facts Pursuant to Local Civil Rule 56.1, dated July 15, 2016, and the accompanying Memorandum of Law, dated July 15, 2016, and all pleadings and proceedings previously had herein, defendants City of New York, Undercover Police Officer #2570, Detective Christopher Cooke (s/h/a "Detective Cook"), Detective Vincent Dauge (s/h/a "Detective Dauge"), Sergeant Claudio Ramirez (s/h/a "Sargeant [sic] Ramirez"), and Sergeant Frank Chiodi (s/h/a "Police Officer Frank Chiodi") (hereinafter referred to collectively as "Defendants") will move this Court, before the Honorable Ann M. Donnelly, United States District Judge, at the United States District Court for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York, at a date and time to be determined by the Court, for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court Order dated June 2, 2016, plaintiff's opposition papers, if any, should be served on the undersigned on or before September 19, 2016.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court Order dated June 2, 2016, Defendants' reply papers, if any, shall be served on plaintiff on or before September 26, 2016.

Dated: New York, New York
July 15, 2016

ZACHARY W. CARTER
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By: /s/
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